

IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

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SO. DIST. IN. 11-11

JOHN J. O'NEAL
CLERK

In Re:) Chapter 11
) No. 01-16128-BHL-11
THE HARROLD FAMILY LIMITED)
PARTNERSHIP) MOTION TO APPEAR
) PRO HAC VICE

Rod Kubat respectfully requests to be permitted to appear and participate on behalf of New Frontier Bank, a secured creditor in the above-captioned case. In support of his Motion, Mr. Kubat states:

1. I am competent to testify and base this declaration on my own personal knowledge.
2. I am an attorney and shareholder in the law firm of Nyemaster, Goode, Voigts, West, Hansell & O'Brien, P.C., 700 Walnut, Suite 1600, Des Moines, Iowa 50309.
3. I have been a member in good standing of the bars of the states of Iowa and Kansas since 1976 and have extensive experience and training in bankruptcy law and bankruptcy matters, including, but not limited to, Chapter 11 bankruptcy cases and adversary proceedings in bankruptcy cases. I am a resident of the State of Iowa and principally practice law in that jurisdiction. I am also admitted to practice before the following courts: all state and federal courts in Iowa, and the Eighth Circuit Court of Appeals.
4. There are no disciplinary proceedings presently pending against me. No disciplinary proceedings have ever been instituted against me. My license, certificate, or privilege to appear and practice before any judicial or regulatory administrative body has never been suspended or revoked. I have never terminated or attempted to terminate by my

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resignation, withdrawal, or otherwise, my office as an attorney in order to avoid disciplinary or disbarment proceedings.

5. I agree to submit to and comply with all provisions and requirements of the United States Bankruptcy Court for the Southern District of Indiana.

WHEREFORE, Rod Kubat respectfully requests the Court to enter and enroll an order permitting him to appear and participate *pro hac vice* on behalf of New Frontier Bank in the above-captioned case.

VERIFICATION

I declare under penalty of perjury under the laws of Indiana and Iowa that the foregoing is true.

DATED this 30th day of November, 2001 at Des Moines, Iowa.



Rod Kubat, Iowa No. 3044
NYEMASTER, GOODE, VOIGTS, WEST,
HANSELL & O'BRIEN, P.C.
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Des Moines, IA 50309-3899
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ATTORNEY FOR NEW FRONTIER BANK

Original filed.

Copies to:

The Harrold Family Limited Partnership
9343 Seascap Drive
Indianapolis, IN 46256
CHAPTER 11 DEBTOR

Leonard Opperman
Kunz & Opperman
135 N. Pennsylvania Street, Suite 1750
Indianapolis, IN 46204-2400
ATTORNEY FOR DEBTOR

Bruce Brattain
151 N. Delaware Street, Suite 760
Indianapolis, IN 46204
ATTORNEY FOR FARMERS BANK

Office of U.S. Trustee
101 West Ohio Street
Indianapolis, IN 46204
U.S. TRUSTEE

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing instrument was served upon all parties to the above cause or to each of the attorneys of record herein at their respective addresses disclosed on the pleadings on November 30, 2001.

By: ☒ U. S. Mail ☐ FAX
☐ Hand Delivered ☐ Overnight Courier
☐ Federal Express ☐ Other: _____

Signature: Chris Anderson